

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JON FREY

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Criminal No. 20-CR-386

ORDER

AND NOW, this day of , 2021, upon consideration of Defendant's Motion for Continuance, it is hereby ORDERED and DECREED that said Motion is Granted for the following reason:

Pursuant to the Speedy Trial Act, 18 U.S.C. § 3161 (h) (8) the ends of justice are best served by granting the defendant's request. Specifically, defense counsel must be adequately prepared to represent his client, the defendant is free on bond and is not opposed to the delay, the defendant is in need of medical care, the Government is not opposed to the delay and the delay is necessary to allow the parties to either prepare or negotiate a non-trial disposition. In light of the foregoing, the ends of justice served by granting defendant's request outweigh the best interest of the public and the defendant in a speedy trial.

BY THE COURT:

J.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 20-CR-386
 :
 JON FREY :

MOTION FOR CONTINUANCE

COMES NOW, Jon Frey, by and through his attorney, Gregory J. Pagano, Esquire, and requests that this Court grant a postponement of the pretrial deadlines and trial date scheduled in the above captioned matter and in support thereof avers as follows:

1. On or about November 1, 2020, Defendant was indicted on charges for violations Title 18, United States Code, Section 2252(a)(4XB), (bX2) and Title 18, United States Code, Section 2252(aX2), (bX1).

2. After a hearing before this Court on January 14, 2021, pretrial release was granted with strict conditions and the defendant was released from custody on January 26, 2021.

3. Counsel for the defendant has received some discovery, but given the restrictions in place due to COVID, counsel was not able to visit with the defendant while he was in custody resulting in significant delay in trial preparations.

4. Additional time is requested to complete the collection and review of discovery by counsel and the defendant.

5. Counsel for the government, A.U.S.A. Jeanette Kang does not oppose the request to continue this trial.

WHEREFORE, it is respectfully requested that this Honorable Court GRANT the Defendant's

request to postpone pretrial deadlines and continue the trial listing of April 20, 2021.

Respectfully submitted:

_____/s/_____

GREGORY J. PAGANO, ESQUIRE

Attorney for Defendant, Jon Frey

1315 Walnut Street, 12th Fl.

Philadelphia, PA 19107

215-636-0160

DATED: January 27, 2021

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JON FREY

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Criminal No. 20-CR-386

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Motion for Continuance has been served upon A.U.S.A. Jeanette Kang, U. S. Attorney's Office, 615 Chestnut Street, Philadelphia, PA 19106, via the Court's Electronic Filing System.

/s/ _____
GREGORY J. PAGANO, ESQUIRE